

MOVING PARTY

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Page 1 of 2

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, INC.

Debtor, Chapter 7

Case Name: GIGA WATT, INC.

Case No: 18-03197 FPC 7

The Honorable Frederick P. Corbit

**MOTION FOR ORDER OF
CONTINUANCE OF UPCOMING
HEARING**

This motion is in reference to "*Notice of Chapter 7 Trustee's First Omnibus Objection To Claims*," document number 1098, filed October 2, 2024, at 14:24:47, by Pamela Egan, Esq., on behalf of Giga Watt and bankruptcy trustee Mark D. Waldron, Esq. (hereinafter "the Omnibus Objection").

I, Andrea Sharp, a creditor in the Giga Watt bankruptcy case, respectfully move this Honorable Court for an order to postpone:

- 1) the date of the hearing for the Omnibus Objection,
and
- 2) the date of the deadline for filing and serving a response to the Omnibus Objection.

The hearing is currently scheduled for November 13, 2024, at 11:30 am. The current deadline for respondents to file and serve documentation for the hearing is November 6, 2024.

My request is for a postponement of both the hearing and its filing deadline of at least one month if a postponement to January, 2025, is not possible.

My reasons for requesting a continuance include:

- The time reasonably needed to respond with quality that efficiently communicates the truth and validity of my position.
- The time needed to respond with quality that respects the court's time, effort, and attention.

Continues on Page 2

- The time needed to properly file and serve my response in accordance with the court's procedures and guidelines.
- The vast difference between the debtors' lawyers' legal experience, knowledge, skills, and resources, and mine.
- The complexity and old age of the case. After five years, the creditors, who are not legal professionals, are being rushed to try—in just one month—to prepare, file, and serve their responses to the complexities and extreme importance of the Omnibus Objection.
- The date I first learned about the Omnibus Objection and the hearing for it, which was October 13. just three and a half weeks before the November 6 deadline to serve and file.
- Personal circumstances.
- My own old age.

Thank you very much for considering this request.

Should you choose to deny it, I will continue with my very earnest effort to properly prepare, file, and serve my truthful response in time to meet the current pressing November-6 deadline.

Respectfully submitted,



Andrea Sharp